

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-177

TRAVIS M. KAMPS,

Defendant.

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**DEFENDANT'S SECOND MOTION FOR BOND MODIFICATION**

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Travis M. Kamps, by counsel, pursuant to 18 U.S.C. § 3142, hereby requests that his bond be modified to allow his pre-trial services officer to give permission for him to travel outside of the district for purposes of employment, as long as he returns home within the same day. In support, Mr. Kamps states the following:

1. On November 10, 2016, Mr. Kamps was arraigned on a one count indictment charging him with sexual exploitation of a minor in violation of Title 18 U.S.C. Section 2251(a). On January 23, 2017, Mr. Kamps pled guilty to a one count Information charging him with receipt of child pornography in violation of Title 18, U.S.C Sections 2252A(a)(2) and (5)(B). At the arraignment, Mr. Kamps was released on a signature bond with the following conditions: report to pretrial services as

directed; travel restricted to the state of Wisconsin and must reside at home each evening; avoid all contact with victim or witness; no weapons or other dangerous weapons; refrain from all use of alcohol; participate in location monitoring with home detention wherein all activities outside of those deemed to be essential must be approved in advance by supervising officer; no unsupervised contact with children under the age of 18 years old; and no internet without prior approval from supervising officer.

2. Sentencing for Mr. Kamps is currently set for April 17, 2017, at 1:30 p.m.

3. As the court may recall, Mr. Kamps has always worked in the family business, Statewide Building Services. The company is owned by his father, and he and his two brothers are the only employees. There is a contract that requires work being done in Escanaba, Michigan. Mr. Kamps will travel to and from the work site with his brother and at no time will it require an overnight stay. At this time, the work is likely to only require one full day on site, Wednesday, February 15, 2017. However, in an abundance of caution and so as to not have to file additional motions with the court for this purpose, counsel is seeking modification of the conditions of release to allow Mr. Kamps' pre-trial services officer to grant permission for him to travel out of the district for employment purposes, with the understanding that it can only be granted for work that requires no overnight stays.

4. Counsel spoke with the probation office, and they have confirmed that

Mr. Kamps has been fully compliant with all conditions of release, including all terms of location monitoring. As to the specifics of this request to modify the conditions of release, the probation office takes no position.

5. Counsel communicated with Assistant United States Attorney Daniel Humble regarding this request, and he has no objection to this request to modify Mr. Kamps conditions of release.

WHEREFORE, Travis M. Kamps, respectfully requests the Court modify his conditions of bond to allow his pre-trial services officer to give permission for him to travel outside of the district for purposes of employment, as long as he returns home within the same day.

Dated at Green Bay, Wisconsin, this 13<sup>th</sup> day of February, 2017.

Respectfully submitted,

**s/ Krista Halla-Valdes**

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